

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

RICHARD E. KAPLAN,

*Plaintiff,*

v.

FIRST HARTFORD CORPORATION,

*Defendant.*

Civil Action No. 04-10402-RCL

**DEFENDANT'S ASSENTED-TO MOTION TO EXTEND TIME**

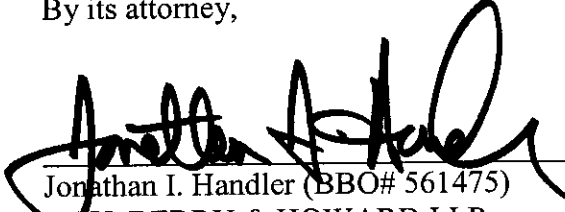
Defendant hereby moves pursuant to Fed. R. Civ. P. 6(b) to extend the time within which it must answer Plaintiff's Complaint and Demand for Jury Trial (the "Complaint") or move pursuant to Fed R. Civ. P. 12 in response thereto, up to and including March 29, 2004.

WHEREFORE, Defendant requests that the Court grant this assented-to motion and extend the time by which it must answer or respond to the Complaint.

Respectfully submitted,

FIRST HARTFORD CORPORATION

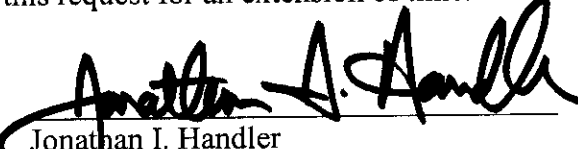
By its attorney,

  
Jonathan I. Handler (BBO# 561475)  
DAY, BERRY & HOWARD LLP  
260 Franklin Street  
Boston, MA 02110-3179  
(617) 345-4600

Dated: March 22, 2004

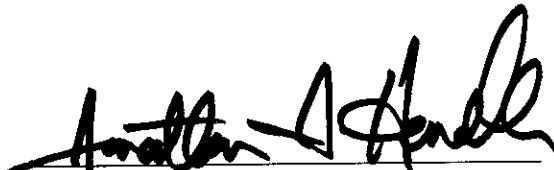
**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to Local Rule 7.1(A)(2), I, Jonathan I. Handler, counsel for the Defendant, First Hartford Corporation, hereby certify that I conferred with Larry C. Kenna, counsel for Plaintiff Richard E. Kaplan, and that he assented to this request for an extension of time.

  
Jonathan I. Handler

**CERTIFICATE OF SERVICE**

I, Jonathan I. Handler, hereby certify that on March 22, 2004, I have served the within **Defendant's Assented-to Motion to Extend Time** by causing a copy to be sent by U.S. Mail to: Larry C. Kenna, Esq., Choate, Hall & Stewart, Exchange Place, 53 State Street, Boston, Massachusetts, 02109.

  
Jonathan I. Handler

03/22/2004

# Day, Berry & Howard LLP

COUNSELLORS AT LAW

Jonathan I. Handler  
Direct Dial: (617) 345-4734  
E-mail: [jihandler@dbh.com](mailto:jihandler@dbh.com)

March 22, 2004

**VIA HAND DELIVERY**

Clerk - Civil  
United States District Court  
1 Courthouse Way  
Boston, MA 02210

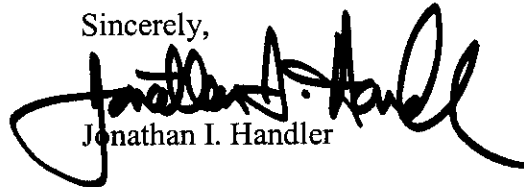
**Re: Richard E. Kaplan v. First Hartford Corporation**  
**C.A. No. 04-10402-RCL**

Dear Sir or Madam:

Enclosed for filing in the above-captioned matter, please find *Defendant's Assented-to Motion to Extend Time*.

Please docket this motion in your usual fashion, and kindly indicate your receipt and filing by stamping the attached copy of this letter and returning it to me via the messenger.

Sincerely,



Jonathan I. Handler

Enclosure

cc: Larry C. Kenna, Esq.